

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KAMILAH JOLLY, *individually and on behalf of  
all others similarly situated,*

Plaintiff,

v.

FURTHERED, INC. d/b/a LAWLINE,

Defendant.

Case No. 1:24-cv-06401-LJL

DIEGO ALVAREZ-MIRANDA EZPELETA,  
*individually and on behalf of all others similarly  
situated,*

Plaintiff,

v.

FURTHERED, INC. d/b/a LAWLINE,

Defendant.

Case No. 1:24-cv-06709-LJL

**NOTICE OF UNOPPOSED MOTION TO CONSOLIDATE AND  
APPOINT INTERIM CLASS COUNSEL**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, the Declarations of Matthew J. Langley and Arun Ravindran, and the exhibits attached thereto, Plaintiffs Kamilah Jolly and Diego Alvarez-Miranda Ezpeleta respectfully move this Court, before the Honorable Lewis J. Liman at the United State Courthouse, Courtroom 15C, 500 Pearl Street, New York, NY 10007, for an order consolidating the above actions, pursuant to Federal Rule of Civil Procedure 42(a), and to appoint Matthew J. Langley of Almeida Law Group LLC, counsel for the Plaintiff Jolly and Arun Ravindran of Hedin LLP, counsel for the Plaintiff

Ezpeleta (collectively, “Proposed Co-Lead Counsel”) as interim Class counsel to represent the proposed Class pursuant to Federal Rule of Civil Procedure 23(g).

Dated: October 15, 2024

Respectfully submitted,

s/: Matthew J. Langley

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/s/ Arun Ravindran

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\* *Pro Hac Vice* Application Forthcoming

\*\* Application for Admission Forthcoming

*Proposed Co-Lead Class Counsel for Plaintiffs &  
the Putative Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

*s/ Arun G. Ravindran*

Arun G. Ravindran